

**THE WAGNER LAW GROUP PC**  
**(formerly known as Wagner Jones**  
**Kopfman & Artenian, LLP**

Nicholas J.P. Wagner (Bar No. 109455)  
David D. Doyle (Bar No.100595)  
1111 E. Herndon Avenue, Suite 317  
Fresno, California 93720  
(559) 449-1800  
(559) 449-0749 Fax  
Email: bwagner@wagnerjones.com  
Email: doyle@ddmslaw.com

Attorney for Brenda Wright and numerous Wildfire Claimants

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In Re:

PG&E CORPORATION and PACIFIC  
GAS & ELECTRIC COMPANY

Debtors

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas & Electric  
☒ Affects Both Debtors

Case No. 19-30088-DM

**JOINDER IN ABRAMS MOTION TO  
FILE SUPPLEMENTS TO CLAIMS  
AGAINST PGE**

**Jointly Administered**

**Judge: Hon. Dennis Montali**

**Date: March 22, 2023**

**Time: 10:00 a.m.**

**Location: Via Video/Teleconference or  
refer to**

**[www.canbuscourts.gov/calendars](http://www.canbuscourts.gov/calendars)**

**US Bankruptcy Court  
Courtroom 17  
450 Golden Gate Avenue  
16<sup>th</sup> Floor  
San Francisco, CA 94102**

This joinder is filed on behalf of Camp Fire victim Brenda Wright and the approximately 660 other fire victims we also represent, and who have filed Proofs of Claim in this Court.

These parties join in the part of Mr. Abrams' motion seeking leave for fire victims to supplement their claims against PG&E for knowingly making false and material misstatements about its safety practices, which artificially inflated the market value of PG&E stock in the runup to approval of the Plan. The value of the stock later fell markedly

1 when the falsity of the misstatements was publicly revealed. As a consequence, the fire  
2 victims did not get the benefit of their bargain contemplated by the Plan for \$6.75 billion in  
3 stock. No one knowledgeable about the assets of the Fire Victims Trust believes the stock  
4 component of the Trust assets will come close to the \$6.75 billion promised in the Plan for  
5 that fire victims will be compensated 100% for their losses, as was contemplated by the  
6 Plan's total number of \$13.5 billion, half in cash and half in stock. This Court has  
7 acknowledged as much in prior orders.

8 One can say, "too bad, those are the breaks," which is no solace to the many thousands  
9 of people who have suffered at PG&E's hands. Justice must not give way to the small and  
10 arcane. This Court can and must take the remedial measure of permitting our clients, Mr.  
11 Tosdal's clients, and the fire victims, *en masse*, to supplement their claims against PG&E in  
12 the same way this Court has permitted Baupost to do by way of approving its stipulation  
13 with PG&E. In this regard, what is good for Baupost is good for the fire victims. It is the  
14 intention of these joining parties to seek compensation directly from PG&E and not from  
15 the Trust.

16 These joining parties oppose the part of the Abrams' motion seeking judicial review  
17 of individual Trust awards, as that could unravel the entire Trust process.

18 March 8, 2023

/s/ Nicholas J.P. Wagner  
Nicholas J.P. Wagner

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28